

**REMARKS/ARGUMENTS**

Claims 1-23 stand in the present application, claims 1, 19, 21 and 23 having been amended. Reconsideration and favorable action is respectfully requested in view of the above amendments and the following remarks.

The Examiner has also rejected claims 1-3, 7, 10, 11, 15, 16, 19 and 20-23 under 35 U.S.C. § 102(b) as being anticipated by Toth, has rejected claim 4 under 35 U.S.C. § 103(a) as being unpatentable over Toth in view of Ahlstrom et al., has rejected claims 5, 6, 8, 9 and 12 under 35 U.S.C. § 103(a) as being unpatentable over Toth in view of Georgalas ("A framework that uses repositories for information and systems and knowledge integration") and has rejected claims 13, 14 and 17 under 35 U.S.C. § 103(a) as being unpatentable over Toth in view of Georgalas (U.S. Patent No. 7,019,740). Applicants respectfully traverse the Examiner's §§ 102 and 103 rejections of the claims.

Applicants have amended independent claims 1, 19, 21, and 23 to more clearly patentably distinguish their inventions over the cited art. Thus, the present claims now more clearly require a method and system providing a user interface to a rule store with each rule identifying a handler program, the handler program being associated with one or more user requirements and being operable to interact with said data storage system in accordance with the user requirements. See, for example, amended independent claims 1 and 19. When a request detailing one or more user requirements is received, the method or system responds by selecting a handler program by searching the rule store for a rule specifying one or more handler programs given the one or more user requirements. Thereafter, the selected handler program is run to interact with the data

storage system. (Claims 21 and 23 have been amended to find a rule in the rule store that specifies a handler program and then to run the specified handler program.)

The amended claims are believed to patentably distinguish over the cited art because they require a user interface to a data storage system which is responsive to the receipt of a request detailing one or more user requirements and which (a) selects a handler program by searching a rule store for a rule specifying one or more handler programs given said one or more user requirements; and (b) runs said selected (or specified) handler program to interact with said data storage system. In contrast, Toth purely deals with a querying mechanism. Toth does not refer to nor does it imply the use of rules in controlling the querying mechanism and it does not select (or specify) a handler program by searching a rule store for a rule specifying one or more handler programs given one or more user requirements. Moreover, none of the other cited prior art documents teaches or suggests the above described features. Hence, no combination of those prior art documents would lead a skilled person to the present invention.

In the Office Action at page 12, the Examiner responds to Applicants' previous arguments for patentability. With respect to the argument and response in section A, it is noted that even if Toth discloses what is alleged by the Examiner – and Applicants do not concede that to be the case – the above described amendments to the independent claims now more clearly patentably distinguish over Toth. More particularly, neither Toth nor the secondary references of Ahlstrom and Georgalas teach or suggest a user interface that selects (or specifies) a handler program by searching a rule store for a

rule specifying one or more handler programs given said one or more user requirements and runs the selected handler program to interact with said data storage system.

With respect to the argument and response in section B, contrary to the Examiner's allegation, paragraph [0024] and claim 22 of Toth do not state that the program instructions are stored in the database (118). Indeed, paragraph [0024] and claim 22 merely state that the computer readable medium (106) stores sequences of instructions. Accordingly, the cited portions of Toth do not support the Examiner's rejections of the present claims.

With respect to the argument and response in section C, it is respectfully submitted that Applicants have carefully reviewed the correct Georgalas reference and it is impossible to find the wording referred to by the Examiner. The terms "new source" and "rule-based queries" have not been found after on-line searching of the reference at <http://ieexplore.ieee.org/iel4/6135/1604/00756761.pdf?arnumber=756761>. See Office Action, dated June 4, 2007, at page 9 (citing those terms in rejecting claims 5 and 6). Accordingly, the Examiner's rejections of at least claims 5 and 6 over Toth combined with Georgalas still cannot be understood. See outstanding Office Action at page 8.

With respect to the argument and response in section D, it is noted that the database in Toth only stores records associated with attributes, which records can be searched. Records retrieved from the database via a query are displayed on a display. However, the retrieved records provide no information regarding management of the network – indeed, Toth makes no mention of its system being attached to or part of a network. So the Examiner's contention that the motivation for introducing features from Ahlstrom into Toth is to "interrogate devices to obtain statistics about the network to

which they are attached" (see Office Action dated June 2, 2007 at page 8) does not make sense because Toth is not attached to a network.

It should not be surprising that Toth does not teach or suggest the above described features of Applicants' inventions in that, as noted previously, the problems the two inventions solve are completely different. Toth aims to simplify a search interface while Applicants' invention aims to achieve flexible management of data in a distributed environment of heterogeneous data storage systems. Hence, a skilled person would not have consulted Toth in order to solve the problem Applicants' invention solves; especially since there is no information in Toth that would be of any help. Thus, there is absolutely no information or hints in Toth that would lead a skilled person to Applicants' invention. Applicants' invention relates to a method for operating a computer system to provide a user interface to a data storage system comprising the steps of selecting (or specifying) a handler program by searching a rule store for a rule specifying one or more handler programs given one or more user requirements. Such a method and system is not taught or suggested by Toth. Hence, independent claims 1, 19, 21 and 23 and their respective dependent claims are believed to patentably define over Toth.

The Examiner further alleges that the dependent claims lack novelty or inventive step in view of Toth in combination with either Ahlstrom or either of the Georgalas references. Ahlstrom concerns a method and apparatus for recognizing and processing conflicts in policies. The error processing in Ahlstrom, which the Examiner considers to be the equivalent of running a default handler program, involves reporting the error in policy definition by for example displaying an error message to a user or writing a

description of the error in a log file. Nowhere is it, however, stated that this error processing involves interacting with a data storage system. Moreover, the stated motivation for combining Toth and Ahlstrom; i.e., to interrogate devices to obtain statistics about the network to which they are attached does not make any sense since the system in Toth does not involve a network. For the above reasons, the invention according to claim 4 is believed to further patentably define over Toth in view of Ahlstrom.

Regarding Georgalas "A framework that uses repositories for information systems and knowledge integration," Applicants cannot find the wording the Examiner alleges is in this document as support for rejecting dependent claims 5, 6, 8, 9 and 12. Applicants respectfully request that the Examiner specify with more particularity where in the reference the wording can be found. In any case, the dependent claims are believed to patentably distinguish over the combination of references by virtue of their dependency on independent claim 1. Similarly, claims 13, 14 17, and 18 are believed to patentably distinguish over Toth in combination with the Georgalas patent by virtue of their dependency on independent claim 1.

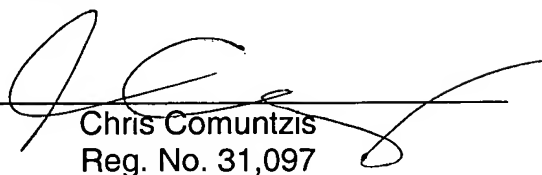
Therefore, in view of the above amendments and remarks, it is respectfully requested that the application be reconsidered and that all of claims 1-23, standing in the application, be allowed and that the case be passed to issue. If there are any other issues remaining which the Examiner believes could be resolved through either a supplemental response or an Examiner's amendment, the Examiner is respectfully requested to contact the undersigned at the local telephone exchange indicated below.

GEORGALAS et al  
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Respectfully submitted,

**NIXON & VANDERHYE P.C.**

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